

TREVOR J. HATFIELD, ESQ.  
Nevada Bar No. 7373  
**HATFIELD & ASSOCIATES, LTD.**  
703 South Eighth Street  
Las Vegas, Nevada 89101  
(702) 388-4469 Tel.  
(702) 386-9825 Fax  
[thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)

*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DAVID VANDERKLIPP, an individual,  
  
Plaintiff,  
  
vs.  
  
PREMIUM WATERS, Inc., a Foreign Corporation,  
  
Defendant.

CASE NO: 2:24-cv-00920-JAD-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
DEFENDANT PREMIUM WATERS,  
INC.'S MOTION FOR SUMMARY  
JUDGMENT  
(ECF #18)  
(Second Request)  
[ECF No. 22]**

COMES NOW, Plaintiff, DAVID VANDERKLIPP, (hereinafter "Plaintiff"), by and through his counsel of record, Trevor J. Hatfield, Esq., of the law firm of Hatfield & Associates, Ltd., and Defendant PREMIUM WATER, INC., (hereinafter "Defendant"), by and through its counsel, the KAMER ZUCKER ABBOTT, do hereby stipulate and agree to extend time for Plaintiff to respond to Defendant's Motion For Summary Judgment (ECF #18), due on April 25, 2025, to May 2, 2025. This request is submitted pursuant to LR IA 6-1, 6-2 and LR 7-1 and is the parties' second request for an extension of time for Plaintiff to respond to Defendant's Motion for Summary Judgment.

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Good cause exists for this extension. Plaintiff is working with the client regarding the undisputed facts as asserted by Defendant regarding Defendant's Motion for Summary Judgment to formulate Plaintiff's response. The parties believe a 7-day extension will suffice.

Defendant has courteously agreed to this extension of time for Plaintiff to file his Response. Accordingly, Plaintiff shall have up to and including May 2, 2025, to respond to Defendant's Motion for Summary Judgment (ECF #18) and Defendant shall have up to and including May 30, 2025, to respond to Plaintiff's Response to Defendant's Motion for Summary Judgment.

**IT IS SO STIPULATED.**

Dated: April 24, 2025

Dated: April 24, 2025

**HATFIELD & ASSOCIATES**

**KAMER ZUCKER ABBOTT**

*/s/ Trevor J. Hatfield*  
By: \_\_\_\_\_  
TREVOR J. HATFIELD, ESQ. (SBN 7373)  
703 S. Eighth Street  
Las Vegas, Nevada 89101  
Tel: (702) 388-4469  
Email: [thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)  
*Attorney for Plaintiff*

*/s/ Dare E. Heisterman*  
By: \_\_\_\_\_  
Dare E. Heisterman, Esq.  
R. Todd Creer, Esq.  
6325 South Jones Blvd., Suite 300  
Las Vegas, Nevada 89118  
Tel: (702) 259-8640  
*Attorneys for Defendant*

**ORDER**

**Based on the parties' stipulation [ECF No. 22] and with good cause appearing, IT IS SO ORDERED.**

  
\_\_\_\_\_  
DISTRICT COURT JUDGE  
April 25, 2025